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9 CLAUDETTE ROBINSON

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA**

12 WILLIAM ROBINSON, JR., an  
13 individual

14 Plaintiff,  
15 vs.

16 CLAUDETTE ROGERS ROBINSON,  
17 an individual,

18 Defendant.

20 CLAUDETTE ROBINSON, an  
21 individual,

22 Counterclaimant,  
23 vs.

24 WILLIAM ROBINSON, JR., an  
25 individual,

26 Counterdefendant.

Case No. 14-cv-01701 JAK (FFMx)

[Hon. John A. Kronstadt]

**JOINT REPORT REGARDING  
ISSUES ON MOTION TO DISMISS**

1 Pursuant to the Court's July 28, 2014 Minute Order [Dkt. No. 37], plaintiff-  
2 counterdefendant William Robinson, Jr. ("Plaintiff") and defendant-counterclaimant  
3 Claudette Robinson ("Defendant") hereby submit the following Joint Report  
4 Regarding Issues on Plaintiff's Motion to Dismiss Defendant's Counterclaims (the  
5 "Motion").

6 **I. THE 1989 STIPULATED JUDGMENT**

7 To the best of the parties' knowledge, there was no modification of the 1989  
8 Stipulated Judgment material to the issues raised in the Motion.

9 **II. DEFENDANT'S INTENDED PURSUIT OF HER COUNTERCLAIMS**

10 Defendant intends to pursue all of her counterclaims. Accordingly, she will  
11 pursue her first counterclaim for declaratory relief with respect to both a fifty percent  
12 tenancy-in-common interest in the copyrights, and a fifty percent interest in the  
13 economic benefits of the copyrights. She will also proceed with her second through  
14 seventh state law counterclaims.

15 **III. SETTLEMENT CONFERENCE WITH MAGISTRATE JUDGE NAGLE**

16 The parties agree that a settlement conference with Magistrate Judge Nagle  
17 prior to the ruling on Plaintiff's Motion will be productive.

18 Dated: August 4, 2014

KATTEN MUCHIN ROSENMAN LLP  
19 Zia F. Modabber  
Tami Kameda Sims  
20 Jarin R. Jackson

21 By: /s/ Zia F. Modabber

22 Zia F. Modabber

23 Attorneys for Defendant and Counterclaimant  
CLAUDETTE ROBINSON

24 Dated: August 4, 2014

FOX ROTHSCHILD LLP

25 By: /s/ Patrick J. Hagan

26 Neal S. Cohen

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